

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Cr. No. 09-50 (02) MJD/SER

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	MOTION FOR MODIFICATION
	)	OF CONDITIONS OF RELEASE
v.	)	
	)	
SALAH OSMAN AHMED,	)	
	)	
Defendant.	)	

Comes now Defendant Salah Osman Ahmed, through undersigned counsel, respectfully requesting the Court's Order modifying his conditions of release to permit his travel to Seattle, Washington, on July 2, 2011, for purposes of visiting family, and returning to Minneapolis, Minnesota on July 6, 2011.

Undersigned counsel has consulted with U.S. Pretrial Services Officer Penny Wickenheiser with regard to the proposed travel. Ms. Wickenheiser has supervised Mr. Ahmed's conditional release and made visits with the defendant at home over the past year. Ms. Wickenheiser has authorized undersigned counsel to represent to the Court that Mr. Ahmed is in compliance with all rules of U.S. Pretrial Services and the requirements of his conditional release. Ms. Wickenheiser does not object to permitting Mr. Ahmed to travel as requested on this occasion.

Undersigned counsel has also consulted with William Narus, Trial Attorney in the Terrorism Division, United States Department of Justice and an attorney of record for the government in this case. Mr. Narus has authorized counsel to represent to the Court that the government does not oppose permitting Mr. Ahmed to travel as requested by this motion.

For the foregoing reasons, Mr. Ahmed respectfully requests this Court's Order modifying his conditional release pending sentencing to permit him to travel to Seattle, Washington on July 2, 2011, returning to Minneapolis on July 6, 2011. It is further requested that the modification permit Mr. Ahmed to arrange the details of his travel, including addresses at which he will stay, telephone numbers, and other contact information and obligations, with Ms. Wickenheiser prior to his departure.

Date: June 27, 2011

/s/ **James E. Ostgard**

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